

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

MEREDITH D.DAWSON,

Plaintiff,

v.

GREAT LAKES EDUCATIONAL LOAN  
SERVICES, INC., GREAT LAKES  
HIGHER EDUCATION CORPORATION,  
JILL LEITL, DAVID LENTZ, MICHAEL  
WALKER, THE UNITED STATES OF  
AMERICA, THE UNITED STATES  
DEPARTMENT OF EDUCATION, and  
ARNE DUNCAN, in his official capacity as  
United States Secretary of Education,

Defendants.

Case No. 15-cv-475-bbc

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**FEDERAL DEFENDANTS' MOTION TO DISMISS THE COMPLAINT**

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Pursuant to Fed. R. Civ. P. 12(b)(1) and (6), Defendants the United States of America, the United States Department of Education and Arne Duncan, in his official capacity as United States Secretary of Education (collectively, the "Federal Defendants"), respectfully move the Court for an order dismissing the Complaint as to them. The reasons in support of this Motion are set forth in the accompanying Memorandum.

Dated: October 9, 2015

Respectfully submitted,

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Principal Deputy Assistant Attorney General

Ruth A. Harvey  
Director

Lloyd H. Randolph  
Assistant Director

s/ Terrance A. Mebane  
Terrance A. Mebane  
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Education, and Arne Duncan, in his official  
capacity as United States Secretary of  
Education*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 9, 2015, a true and correct copy of the foregoing, *Federal Defendants' Motion to Dismiss*, was filed electronically with the Court's Electronic Case Filing (ECF) system. I understand that notice of this filing will be sent to all parties by operation of the Court's ECF system.

s/ Terrance A. Mebane  
Terrance A. Mebane